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6
7 UNITED STATES DISTRICT COURT

8 NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION
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10 TAMARA WAREKA p/k/a TAMARA
WILLIAMS,

11 Plaintiff,

12 vs.

13 ELSIE GREEN INC. and DOES 1 through 10,
14 inclusive,

15 Defendants.
16

Case No. 4:23-cv-03160 HSG

**JOINT STIPULATION AND ORDER TO
EXTEND TIME TO ANSWER OR
OTHERWISE RESPOND TO
COMPLAINT AND TO CONTINUE
INITIAL CASE MANAGEMENT
CONFERENCE (SECOND
EXTENSION)-AS MODIFIED**

The Hon. Haywood S. Gilliam, Jr.
Action Filed: June 26, 2023
Trial Date: Not Set

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STIP AND ORDER TO EXTEND TIME TO RESPOND
TO COMPLAINT AND TO CONTINUE INITIAL CMC
(SECOND EXTENSION)
- Case No. 4:23-cv-03160 HSG

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Pursuant to Civil L.R. 6-1(b), 6-2, and 7-12, Defendant Elsie Green, Inc. (“Defendant” or “Elsie Green”) and Plaintiff Tamara Wareka p/k/a Tamara Williams (“Plaintiff” or “Wareka”) respectfully submit this joint stipulation to continue the deadline for Defendant to answer or otherwise respond to the Complaint and to continue the Initial Case Management Conference (“CMC”):

WHEREAS on June 26, 2023, Plaintiff filed the Complaint (Dkt. No. 1);

WHEREAS on June 27, 2023, the Court issued an order setting an initial CMC for September 26, 2023, at 2:00 p.m., along with related deadlines (Dkt. No. 6);

WHEREAS on September 20, 2023, Plaintiff served its Complaint on Defendant (Dkt. No. 9);

WHEREAS on October 9, 2023, Defendant filed a Joint Stipulation and [Proposed] Order to Extend Time to Answer or Otherwise Respond to Complaint and to Continue Initial Case Management Conference, representing the parties’ agreement to extend Defendant’s response deadline because Defendant had recently retained outside counsel (Dkt. No. 14);

WHEREAS on October 10, 2023, the Court issued an order extending Defendant’s time to answer or otherwise respond to the Complaint to November 22, 2023 and continuing the initial CMC to December 12, 2023 (Dkt. No. 15);

WHEREAS the parties are currently discussing an early resolution and would benefit from additional time, and have agreed to (i) a four-week extension of Defendant’s deadline to answer or otherwise respond to the Complaint, to and including December 20, 2023 and (ii) a four-week extension of the initial CMC, to and including January 9, 2024;

WHEREAS this is Defendant’s second request for an extension of time;

NOW, THEREFORE, THE PARTIES HEREBY STIPULATE, and request that the Court order, as follows:

1. Defendant’s time to answer or otherwise respond to the Complaint shall be extended to **December 20, 2023**.

2. The initial Case Management Conference shall be continued to **January 9, 2024**, at 2:00 p.m., or as soon thereafter as is convenient for the Court.

STIP AND ORDER TO EXTEND TIME TO RESPOND
TO COMPLAINT AND TO CONTINUE INITIAL CMC
(SECOND EXTENSION)

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2 Dated: November 17, 2023

FARELLA BRAUN + MARTEL LLP

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4 By: /s/ Sushila Chanana
Sushila Chanana

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6 Attorneys for Defendant ELSIE GREEN, INC.

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8 Dated: November 17, 2023

HIGBEE & ASSOCIATES

9
10 By: /s/ Mathew K. Higbee
Mathew K. Higbee
Ryan E. Carreon

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12 Attorneys for Plaintiff TAMARA WAREKA f/k/a
TAMARA WILLIAMS

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15 **ATTESTATION**

16 I, Sushila Chanana, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that concurrence in
17 the filing of this document has been obtained from each signatory hereto.

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19 /s/ Sushila Chanana
Sushila Chanana

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21 Attorneys for Defendant ELSIE GREEN, INC.

PURSUANT TO STIPULATION, IT IS SO ORDERED:

1. Defendant Elsie Green, Inc.'s time to answer or otherwise respond to the Complaint shall be extended to **December 20, 2023**.

2. The initial Case Management Conference shall be continued to **January 9, 2024**, at 2:00 p.m. The dial-in information and instructions remain the same as previously provided in docket no. 8.

Dated: 11/20/2023


The Honorable Judge Haywood S. Gilliam, Jr.
U.S. District Judge